

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ROBSON XAVIER GOMES, DARWIN
ALIESKY CUESTA-ROJAS and JOSE
NOLBERTO TACURI-TACURI, on behalf
of themselves and all those similarly situated,

Petitioners-Plaintiffs,

v.

CHAD WOLF, Acting Secretary of
Department of Homeland Security,

MARCOS CHARLES, Immigration and
Customs Enforcement, Enforcement and
Removal Operations, Acting Field Office
Director,

CHRISTOPHER BRACKETT,
Superintendent of the Strafford County
Department of Corrections,

Respondents-Defendants.

Civil Action No. 1:20-cv-00453-LM

STIPULATED PROTECTIVE ORDER
REGARDING CONFIDENTIAL INFORMATION

With the agreement of the parties, the Court having determined that there is good cause for issuance of a protective order to govern the disclosure, use, and handling by the parties and their respective agents, successors, personal representatives and assignees of private medical information otherwise protected from disclosure by the Health Insurance Portability and Accountability Act, Pub. L. 104-191, [110 Stat. 1936](#) (1996), or any other federal statute governing the disclosure of personally identifiable information in the above-captioned action, IT IS HEREBY ORDERED as follows:

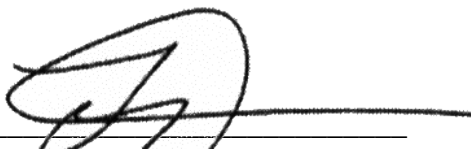
1. The Court requires the parties to produce private medical information for purposes of this litigation. Such private medical information produced by either party during

discovery or otherwise made available for the litigation will not be disseminated beyond counsel for the parties, as defined to include associated personnel necessary to assist counsel in this action, such as law student interns working under the supervision of counsel of record in this matter, litigation assistants, paralegals, and litigation support, information technology, information or records management, investigative, secretarial, or clerical personnel.

2. Such private medical information may be disclosed to experts or consultants for the parties, provided the attorney of record first informs the expert that such information to be disclosed is confidential and to be used solely for the purpose of this litigation and further that these restrictions are imposed by a court order.

3. The parties will appropriately redact all private medical information in any filings submitted to the Court.

SO ORDERED.



Landya B. McCafferty, Chief Judge
U.S. District Court
District of New Hampshire

Dated: April 24 , 2020